

# **EXHIBIT 2**

**In The Matter Of:**

*STELLA v.*

*DAVIS COUNTY*

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ZACHERY TYLER LLOYD

August 22, 2018



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*Q & A Reporting, Inc.*

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*Salt Lake City, Utah 84115*

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IN THE UNITED STATES DISTRICT COURT  
STATE OF UTAH, CENTRAL DIVISION

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CYNTHIA STELLA, and the	)	
ESTATE OF HEATHER MILLER,	)	
	)	
Plaintiffs,	)	
	)	Case No: 1:18-cv-002
vs.	)	
	)	Judge: Jill Parish
DAVIS COUNTY, SHERIFF TODD	)	
RICHARDSON, MARVIN	)	
ANDERSON, JAMES ONDRICEK,	)	
	)	
Defendants.	)	

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DEPOSITION OF: ZACHERY TYLER LLOYD

August 22, 2018  
9:38 a.m. to 10:58 a.m.

Location: LAW OFFICES OF TAD D. DRAPER  
12339 South 800 East, Suite 101  
Draper, Utah 84020

Reporter: Jennifer Nazer Braun, CSR, RPR

ZACHERY TYLER LLOYD - August 22, 2018

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Also Present: CYNTHIA STELLA

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I N D E X

The Witness: ZACHERY TYLER LLOYD

Examination by Page

MR. DRAPER.....5

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## E X H I B I T S

No.	Description	Page
No. 1	Davis County Sheriff's Office.....6 Incident Details, dated 12-22-17	
No. 2	Utah Attorney General's Office.....43 General Offense Hardcopy, dated 3-8-17	
No. 3	Utah Attorney General's Office.....44 General Offense Hardcopy, dated 2-27-17	
No. 4	Utah Attorney General's Office.....44 General Offense Hardcopy, dated 5-2-17	
No. 5	Utah Attorney General's Office.....48 General Offense Hardcopy, dated 3-8-17	
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## R E Q U E S T S

(No items were requested)

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1 August 22, 2018

9:38 a.m.

2 P R O C E E D I N G S

3 ZACHERY TYLER LLOYD,

4 called as a witness, having been duly sworn,

5 was examined and testified as follows:

6 EXAMINATION

7 BY MR. DRAPER:

8 Q. Deputy Lloyd, would you please state your  
9 full name for the record?

10 A. Zachery Tyler Lloyd.

11 Q. I can give these instructions off the  
12 record, but I'll just tell you, it's very important  
13 that your answers are verbal. It's really normal for  
14 us to say uh-huh (affirmative) and uh-uh (negative)  
15 and shake our heads. It's a little awkward  
16 sometimes, but we have to be very clear to create a  
17 record. So make sure all your responses are so that  
18 our reporter can hear them, and that you verbalize  
19 them all. Okay?

20 A. Yeah. Yes.

21 Q. Yes? There you go. That's what we're  
22 after.

23 Well, let me jump in here and ask you  
24 first what you've reviewed in preparation for your  
25 depo today?

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1 A. I just looked over my report.

2 Q. Is that this Memorandum of Interview or  
3 the Davis County Sheriff's Office report?

4 A. My report on the IMS.

5 Q. Let me show you, and then we can mark that  
6 as Exhibit-1. Is that what you looked at?

7 A. Yeah. Yes.

8 MR. DRAPER: Let's mark that as Exhibit-1.

9 (Deposition Exhibit-1 was marked for  
10 identification.)

11 Q. (BY MR. DRAPER:) Now, other than your  
12 attorney, have you spoken to anyone in preparing for  
13 today?

14 A. No.

15 Q. You were interviewed by the attorney  
16 general on March 8th of 2017. Have you ever seen the  
17 transcript of this memorandum that they prepared?  
18 Have you ever seen this report (indicating)? Let me  
19 get you one that's not marked. Sorry.

20 This one is entitled Memorandum of  
21 Interview with Deputy Lloyd.

22 A. Was this one I -- yeah, I haven't seen  
23 this one. When we did the Farmington police station?

24 Q. Yes. When the attorney general came to --  
25 I guess it was the Farmington jail. Is that where



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1 that was conducted?

2 A. Yes.

3 Q. So you've never seen that report?

4 A. No.

5 Q. Okay. Have you seen the video of that  
6 interview with the attorney general?

7 A. No.

8 Q. I'm just going to disclose to you that  
9 I've certainly read that and I've watched that actual  
10 interview. So there's a fair bit of information I'm  
11 already pretty familiar with, but I just need to  
12 clarify some points and get your testimony about this  
13 event.

14 So let's start out with your background.  
15 Tell us a little bit about yourself. You were  
16 working at the jail at the time of this incident.  
17 Are you still working there?

18 A. Currently, yes.

19 Q. What is your position there?

20 A. Just a corrections officer.

21 Q. Tell me about, briefly, your training and  
22 work experience in that field.

23 A. I've been doing it for the last two years.  
24 And before we start, we go through the POST academy,  
25 which I believe is about ten weeks long. You do a

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1 special functions officer training, which is about  
2 six weeks, and then four of basic corrections officer  
3 training.

4 Q. So the corrections officer training is in  
5 addition to what most POST participants do? In other  
6 words, if an officer wanted to go to the POST  
7 training, they don't typically always do the  
8 corrections officer training in addition?

9 A. You don't have to. You can do law  
10 enforcement officer or basic corrections officer.

11 Q. Okay. In general terms, what do they  
12 teach you in that correctional officers training?  
13 What are the things that they're trying to educate  
14 you about?

15 A. You go through things like defensive  
16 tactics, go over some laws of what you can and can't  
17 do.

18 Q. Now, in this interview with the attorney  
19 general at the Farmington -- was it the Farmington  
20 jail where that was taken?

21 A. Farmington Police Department.

22 Q. Police Department.

23 Did you tell the truth at that interview?

24 A. Yes.

25 Q. In this report here, [Exhibit-1](#), that

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1 information there is true and correct, and you  
2 prepared that yourself?

3 A. Yes.

4 MR. BUTTERFIELD: Do you have another copy  
5 of that?

6 MR. DRAPER: I apologize. I do have  
7 copies of all of those.

8 MR. BUTTERFIELD: I have one, but mine  
9 looks different, and so I was --

10 THE WITNESS: There's two reports.

11 MR. DRAPER: Yes.

12 THE WITNESS: There's two reports on it.

13 MR. BUTTERFIELD: Okay.

14 THE WITNESS: Yeah. This isn't mine  
15 (indicating).

16 MR. BUTTERFIELD: Okay. I gotcha. That  
17 makes sense.

18 Q. (BY MR. DRAPER:) Yes, there's some  
19 additional witnesses on there. And I think what  
20 we're talking about on [Exhibit-1](#) is the lower section  
21 that has your name at the top.

22 A. Yes.

23 Q. And then it turns out it actually has your  
24 name at the very bottom too, correct?

25 A. Yes.

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1 Q. And thank you for responding like we need  
2 to. This is going to be great.

3 I want to just jump into a topic,  
4 generally speaking, and that is what you know about  
5 people falling from bunks at the jail. You've been  
6 there a couple of years now?

7 A. Uh-huh (affirmative), yes.

8 Q. You've only worked at this jail facility;  
9 there's no other prior employment. Am I correct?

10 A. Yeah, just the Davis County.

11 Q. So what do you know about falls at the  
12 jail? How often, in your experience or knowledge,  
13 does that happen?

14 MR. BUTTERFIELD: Foundation. Vague and  
15 ambiguous.

16 Go ahead and answer.

17 THE WITNESS: Okay. It happens. I  
18 wouldn't say a lot. I don't know. I don't know,  
19 really.

20 Q. Well, in terms of how many times or how  
21 often per month, is it a regular occurrence? What's  
22 your experience in it, what do you know about that?

23 A. I mean, I've seen it a couple of times. I  
24 know the first week I worked down there, a kid fell  
25 off the bed and slipped, because he was wearing

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1 socks, and split his ear open. Other than that, if  
2 people fall off the bunk and they're okay, they don't  
3 typically tell me, from what I understand.

4 Q. So it can happen without you knowing about  
5 it?

6 A. Yeah.

7 Q. If someone falls off the bunk and you know  
8 about it, just in general terms, do you have a policy  
9 or an idea of what you typically would do for that  
10 person?

11 A. Take them to medical and make sure they're  
12 cleared.

13 Q. When you say take them to medical --

14 A. Seen by a nurse.

15 Q. So if someone falls from a bunk and you  
16 know about it, that's your protocol, you take them to  
17 medical?

18 A. Yes.

19 Q. Does it matter to you if they're maybe not  
20 even showing much of a problem? Do you still take  
21 them to medical?

22 A. Typically, I'll ask them if they want to  
23 see medical. It just depends on how they fall.

24 Q. What medical training do you have? Any?

25 A. Just basic CPR.

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1 Q. So if a person falls from a bunk, what  
2 does that involve? What's the floor like?

3 MR. BUTTERFIELD: Foundation, vague,  
4 incomplete hypothetical.

5 Go ahead and answer.

6 Q. (BY MR. DRAPER:) Are there any floors in  
7 the jail that are for bunks that are not concrete?

8 A. What do you mean?

9 Q. Well, is it a concrete floor in all of  
10 those cells?

11 A. It is, yes.

12 Q. So it's going to be concrete?

13 A. As far as I know, concrete.

14 Q. If you're in that top bunk, what are the  
15 things that you might hit into on the way down?

16 MR. BUTTERFIELD: Incomplete hypothetical.  
17 Go ahead.

18 THE WITNESS: Well, the floor, the bottom  
19 bunk. There's a desk there. There's a stool to the  
20 desk.

21 Q. Is the desk mounted to the wall?

22 A. Yes.

23 Q. I've seen pictures. It's a square desk  
24 mounted to the wall, and there's corners. They're  
25 pointed corners, correct?

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1 A. Yes.

2 Q. So a person that falls from that, if  
3 they're having any kind of medical concern or  
4 symptoms, you're going to send them to medical?

5 A. Yes. Or have medical come.

6 Q. All right. Why do you do that? Why do  
7 you send them to medical or have medical come?

8 A. Just to make sure they're okay.

9 Q. As an officer, what would you expect the  
10 medical people to do if you take them to medical?

11 MR. BUTTERFIELD: Foundation, speculation,  
12 incomplete hypothetical.

13 Go ahead and answer.

14 THE WITNESS: Just look them over and say  
15 they're good to stay there, or take them to medical.  
16 It's up to the nurses. I don't know how they're kind  
17 of trained in that part.

18 Q. I understand.

19 And that's exactly right, you have no  
20 training, per se, for the medical follow-up, so  
21 you're relying on the nurses to clear this person --

22 A. Right.

23 Q. -- before they return to their cell?

24 A. Yes.

25 Q. Are you aware of a written policy in the

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1 jail regarding falls?

2 A. I don't know.

3 Q. You don't know of any?

4 A. I don't know. I haven't really looked  
5 into it.

6 Q. So let's shift to this fall. Let's talk  
7 about Heather Miller.

8 A. Okay.

9 Q. Are you aware and do you remember this  
10 event?

11 A. I know the event and the -- it's been a  
12 while, so...

13 Q. Sure.

14 It occurred on 12/21/16. Is that your  
15 memory? You're okay looking at your report.

16 A. Yeah.

17 Q. So why don't you just tell us what  
18 happened. And I might interrupt you, but start at  
19 when you first became aware that there was an issue.  
20 What were you doing, and what happened?

21 A. Okay. So when we start shift at 6:00 at  
22 night or 6:00 in the morning, either/or, we always do  
23 what's called a head count. So we just make sure  
24 everyone is in their cells, where they're supposed to  
25 be, and they're up and standing at the doors, so we



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1 can physically see them and make sure they're doing  
2 all right.

3 I do remember I went up the stairs in  
4 Kilo, and her celly was pounding on the window,  
5 saying, She fell off the top bunk and hit her head.

6 That's when I went over there, and then I  
7 called medical to come over to look at her.

8 Q. You said celly. That means her cellmate?

9 A. Cellmate, yeah.

10 Q. Just so the reporter will know what --

11 A. Yeah.

12 Q. -- you're talking about.

13 A. Sorry. Cellmate, yeah.

14 Q. No problem.

15 So in the attorney general's report, you  
16 stated that you heard a thud. Is that correct?

17 A. Yeah. Sometimes you hear people get off  
18 the bunks. They, obviously, make a noise, whether  
19 it's their feet or -- yeah.

20 Q. So, in this case, when you're doing the  
21 head count, when you got -- how close to the cell did  
22 you hear that thud?

23 A. It was a couple of cell doors away. I  
24 don't know how far of a distance, but I was pretty  
25 much at the top of the stairs, I believe.

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1 Q. Can you describe more what that thud  
2 sounded like?

3 A. I can't. Just a thud.

4 Q. Okay. Fair enough.

5 Right after that, the cellmate, her celly,  
6 said -- what were the words?

7 A. She just told me her cellmate fell off the  
8 top bunk and she hit her head.

9 Q. So what did you do then?

10 A. Called medical over the radio -- over our  
11 radio.

12 Q. On your intercom radio --

13 A. Yeah.

14 Q. -- that you carry with you?

15 A. Yes.

16 Q. What did you tell medical?

17 A. I just asked them to come to Kilo, I have  
18 a -- someone that fell off the top bunk.

19 Q. And then what did you do?

20 A. I just waited for them to come.

21 At that time, we needed two male deputies  
22 to be in a female unit, unless they're locked down,  
23 and then you can have one. At that time, that's what  
24 it was.

25 Q. There's an area, I've heard it called the

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1 bubble or --

2 A. Yeah.

3 Q. What is this bubble?

4 A. That's where it's -- the pod is where the  
5 computer is. It's where the clerk's in there  
6 watching you. You can see all the units.

7 Q. And then that's where someone would key a  
8 microphone -- activate a microphone in the cell?

9 A. Yes.

10 Q. Is it also where they would activate the  
11 release on the door?

12 A. Yes.

13 Q. So you went over, I assume, to the cell?

14 A. Yes.

15 Q. What did you do when you got to the cell?

16 A. That's when I called medical.

17 Q. And you looked in?

18 A. Yeah, I looked in. She was just on the  
19 ground, rolling around.

20 Q. Rolling around?

21 A. Yeah. And then that's when I called  
22 medical.

23 Q. Did the door get keyed open for you at  
24 that point?

25 A. Did he open the door? He did, but I shut

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1 it immediately, just because the two-male-deputy  
2 rule.

3 Q. All right. But although you closed the  
4 door, were you able to watch her and see her during  
5 this time?

6 A. Yeah. There's a big window you can look  
7 into.

8 Q. And you said she was rolling around. What  
9 else did you observe, if anything?

10 A. That was pretty much it.

11 Q. Was she saying anything, or acting in  
12 pain, or anything like that?

13 A. Well, yeah, I think she was grabbing her  
14 side, saying it hurts.

15 Q. Do you know which side?

16 A. I don't remember.

17 Q. Saying it hurts.

18 At some point, you went in the cell. They  
19 opened the door and you went in?

20 A. I did not. It was Corporal Johnson and  
21 Nurse Marvin.

22 Q. Johnson?

23 A. Uh-huh. Corporal.

24 Q. And Marvin Anderson, right?

25 A. Yeah.

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1 Q. Because, again, in the attorney general's  
2 report it says that you note that she had trouble  
3 breathing.

4 A. (The witness is nodding his head in the  
5 affirmative.)

6 Q. When did you note that?

7 A. It just kind of sounded like the wind got  
8 knocked out of her, when they were in there looking  
9 at her. Then I had to leave, because when she fell,  
10 she knocked some coffee and stuff on the lower bunks,  
11 bedding and stuff. So I went and left to get more  
12 bedding for the other.

13 Q. So your observations of her from outside  
14 the door --

15 A. Yes.

16 Q. -- and what you observed were -- I'm not  
17 trying to just be repetitive; I just want to be  
18 complete. From the time you looked in the cell and  
19 the time you're observing from the door, what can you  
20 tell us about what you observed of her condition?

21 MR. BUTTERFIELD: Asked and answered.

22 Go ahead.

23 THE WITNESS: What do you mean?

24 Q. (BY MR. DRAPER:) You started out saying  
25 that she was rolling around --

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1 A. Yes.

2 Q. -- grabbing her side, says it hurts. And  
3 I have, from the attorney general, you said that she  
4 had trouble breathing.

5 A. It just sounded like the wind got knocked  
6 out of her.

7 Q. Was she able to sit up? Did she sit up on  
8 her own, or did she have to have help?

9 MR. BUTTERFIELD: Foundation.  
10 Go ahead, you can answer.

11 Q. (BY MR. DRAPER:) If you know.

12 A. I don't -- I wasn't there when she sat up.

13 Q. So all the time you were there, including  
14 when Johnson and Anderson arrived, she was still on  
15 the ground?

16 MR. BUTTERFIELD: Misstates prior  
17 testimony, foundation.

18 Go ahead.

19 Q. (BY MR. DRAPER:) I don't want to say it  
20 wrong.

21 A. Right.

22 Q. Let's just make sure we have a clear  
23 understanding of what I'm asking you, okay?

24 A. Okay.

25 Q. So you're at the door.

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1 A. Yes.

2 Q. You had it keyed open. You closed it,  
3 because you're thinking it's not appropriate without  
4 having another deputy.

5 A. Yeah.

6 Q. You continue to watch her. And then  
7 Johnson and Marvin arrived. Did they arrive about  
8 the same time?

9 A. Yes.

10 Q. And then the door --

11 A. I don't remember if they arrived at the  
12 same time or not.

13 Q. Okay, but close to the same time, I'm  
14 assuming. Right?

15 A. Yeah.

16 Q. So then they open the door again?

17 A. (The witness is nodding his head in the  
18 affirmative.)

19 Q. And this time Johnson and Marvin go in?

20 A. (The witness is nodding his head in the  
21 affirmative.)

22 Q. And you stayed there, watching; is that  
23 correct?

24 A. Watching?

25 MR. BUTTERFIELD: Misstates prior

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1 testimony.

2 Q. (BY MR. DRAPER:) They went in. What did  
3 you do?

4 A. I just stood there.

5 Q. Did you observe them sitting her up, or  
6 did she sit up on her own, if you remember?

7 A. I don't remember.

8 Q. So you went off to get a wheelchair.

9 A. No.

10 Q. No. I'm sorry. You went off to get new  
11 bedding.

12 A. Yeah.

13 Q. How long did that take before you got  
14 back?

15 A. I don't know how long it took.

16 Q. When you got back, was she gone?

17 A. Yeah. She was moved to Lima 7.

18 Q. Lima is another --

19 A. It's another unit, but it's the only place  
20 you've got a lower bunk, lower tier.

21 Q. Were you able to observe her walking from  
22 her cell to the stairs?

23 A. No.

24 Q. Were you able to watch her scoot down the  
25 stairs?



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1 A. No.

2 Q. With everything that you did observe  
3 there, what did you expect Nurse Marvin Anderson and  
4 Johnson to do with her?

5 MR. BUTTERFIELD: Foundation, calls for  
6 expert opinion.

7 Go ahead.

8 Q. (BY MR. DRAPER:) I just asked what you  
9 expected them to do. Not what they should have done,  
10 but what you thought they were going to do.

11 A. What I thought they were going to do?

12 Q. Yes. We've talked about falls.

13 A. Uh-huh (affirmative).

14 Q. You showed up at the scene there on this  
15 one, on this fall.

16 A. Uh-huh (affirmative).

17 Q. And you've got the nurse there --

18 A. Yeah.

19 Q. -- and you've got your lieutenant there.

20 A. Corporal.

21 Q. I'm sorry, your corporal.

22 And I know that you left to get bedding --

23 A. Yeah.

24 Q. -- but what was your expectation that they  
25 would do? What were you thinking, in your mind, what

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1 they would probably do for her?

2 MR. BUTTERFIELD: Same objection.

3 Go ahead.

4 THE WITNESS: I'm not really sure. Just  
5 for Nurse Marv to look at her and make sure she was  
6 okay, and that --

7 Q. (BY MR. DRAPER:) Did you expect that they  
8 would take her down to medical? If they're going to  
9 move her, would you think that's where they'd take  
10 her?

11 A. I didn't really think about it.

12 Q. Previously, you told me that on a fall, if  
13 a person falls --

14 A. Yeah.

15 Q. -- you would expect them to check her  
16 out --

17 A. (The witness is nodding her head in the  
18 affirmative.)

19 Q. -- them out.

20 A. Yeah.

21 Q. -- or take them to medical for  
22 observation.

23 A. Yeah. Or the nurse --

24 MR. BUTTERFIELD: Misstates prior  
25 testimony.

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1 Q. (BY MR. DRAPER:) Did I say that wrong, or  
2 is that what you --

3 A. Or they come and look at them in the cell.

4 Q. Okay. They look at them in the cell or  
5 they take them to medical.

6 A. Uh-huh (affirmative).

7 Q. Or maybe both, right?

8 A. Yeah.

9 Q. So what did you think would happen in this  
10 case, based on what you saw her condition being?

11 MR. BUTTERFIELD: Asked and answered.

12 Go ahead. You can answer.

13 MR. DRAPER: We do all this stuff.

14 THE WITNESS: Yeah. What was the  
15 question, again?

16 Q. (BY MR. DRAPER:) I'm back to my same  
17 question.

18 A. Yeah.

19 Q. I mean, I'm not trying to be repetitive,  
20 but you see her rolling around --

21 A. Uh-huh (affirmative).

22 Q. -- grabbing her side, saying it hurts.  
23 Had the wind knocked out of her --

24 A. Yes.

25 Q. -- or as you stated to the attorney

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1 general, she had trouble breathing.

2 A. Yeah.

3 Q. I'll represent that to you.

4 Did you think they would take this type of  
5 person -- they would take her to medical? Is that  
6 what you thought in your mind?

7 MR. BUTTERFIELD: Asked and answered.

8 Go ahead.

9 THE WITNESS: I don't really know. The  
10 nurses do their job, I do mine. I can't -- I didn't  
11 really think about it.

12 Q. (BY MR. DRAPER:) Okay. You did your job,  
13 in terms of getting the medical there, so --

14 A. Yeah.

15 Q. -- I understand that.

16 A. Yeah.

17 Q. What made you think that you needed to  
18 call medical?

19 A. Well, she fell off the bunk and she was on  
20 the ground, and her celly said she hit her head.

21 Q. Is there anything else about that incident  
22 in Kilo that comes to mind, that we haven't  
23 discussed, that you would be able to give us some  
24 information about?

25 A. I don't believe so.

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1 Q. So now she's moved into Lima. Now, this  
2 bubble -- am I calling that by the correct name that  
3 you guys call it?

4 A. Yeah, it's a pod, a bubble.

5 Q. A pod?

6 A. Yeah.

7 Q. Is the better term the pod?

8 A. It's called both. It's interchangeable.

9 Q. So is the guy in there called the bubble  
10 boy? I'm just kidding.

11 Okay. This pod, this bubble, is it the  
12 same pod that has a view of Kilo and Lima?

13 A. Yes.

14 Q. So how is it set up? Is it like a wheel  
15 or something?

16 A. It's a --

17 Q. Is it like the hub of a wheel? I'm just  
18 trying to understand.

19 A. It's just like a room that's got windows  
20 all around it, and then -- it's called the horseshoe.  
21 It's pretty much a hallway, and then it's got windows  
22 to Lima, Kilo, Juliett and India.

23 Q. I see.

24 A. So you can look.

25 Q. Okay. So even though she's moved to

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1 Lima --

2 A. Uh-huh (affirmative).

3 Q. I think it was Clerk Rogers that was --

4 A. Yeah.

5 Q. -- there during this whole time. He's  
6 able to see her now in Lima as well?

7 MR. BUTTERFIELD: Foundation.

8 Go ahead.

9 THE WITNESS: Like I said, there's a  
10 window there --

11 Q. Yes.

12 A. -- so it's --

13 Q. Fair enough.

14 Do you know if it was Clerk Rogers that  
15 you spoke to when she was in Kilo? Is that who was  
16 there?

17 This whole event that she falls --

18 A. Yeah.

19 Q. -- did you talk to the person in the  
20 bubble or the pod, a mic or anything?

21 A. I don't remember.

22 Q. They're obviously watching --

23 A. Yeah.

24 Q. -- so they can open the door.

25 A. Yeah.

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1 Q. Can you tell if the microphone has been  
2 turned on in the cell?

3 A. You can if it's quiet, you can hear it  
4 click on, but I mean, I don't know if -- I'm assuming  
5 he did. They usually do, but I don't know.

6 Q. So how long after that event was it before  
7 you next interacted with this inmate in Lima? How  
8 much time went by?

9 A. Before we got her moved out of Lima?

10 Q. Yes, your next time having any kind of  
11 contact with her down in Lima.

12 A. I don't really remember the -- because  
13 they would have had another round, because there was  
14 a head count at 6, a round at 7ish, around that area,  
15 another round at 8. I can't remember. The only time  
16 I remember is when I saw her at the door, with blood  
17 on her chin, and that's when I got another deputy.

18 Q. We'll talk about that in a minute here.

19 A. Okay.

20 Q. I have in your attorney general statement  
21 that you did a check at 7 and 7:30. Does that sound  
22 right?

23 A. That, I don't remember.

24 Q. Do you remember telling Mr. Rogers that  
25 you had done the 7:00 check?

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1           A.       He would have watched me do it.

2           Q.       Okay.  So if he did say that you told him  
3   you did the 7:00, or he knew about that, that would  
4   seem consistent with what your understanding is as  
5   well?  In other words, if that's what he's saying,  
6   does that sound right, that you did a 7:00 check  
7   and --

8           A.       Yeah.

9           Q.       -- 7:30 check?

10          A.       Yeah.  Yes.

11          Q.       Now, she went to Lima.  I want to diverge  
12   for just a moment and talk about what I've heard  
13   referred to as medical checks.

14                 Do you know if she was assigned to have  
15   medical checks while she was in Lima?

16                 MR. BUTTERFIELD:  Foundation.

17                 Go ahead and answer.

18                 THE WITNESS:  We call them 30-minute  
19   watches, medical watches.  I don't remember if we put  
20   one on her or not.

21          Q.       (BY MR. DRAPER:)  Tell me about this  
22   30-minute watch.

23          A.       Uh-huh (affirmative).

24          Q.       What's the deal on that?

25          A.       We have 15-minute watches and 30-minute



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1 watches, and then our hourly rounds. Thirty-minute  
2 watches are -- we just kind of keep an eye on them.  
3 Typically, if they're suicidal, we just do more  
4 frequent rounds, usually around 30 minutes or an  
5 hour. And if they really seem highly suicidal or  
6 something, then we put them on a 15-minute watch.  
7 But we can put them on for observations. It doesn't  
8 have to be a suicide watch.

9 Q. I see.

10 A. Just if they feel that -- medical or  
11 mental health or the watch commander feels they need  
12 to be watched more, they'll put a 30- or 15-minute  
13 watch on them.

14 Q. So if someone says, We want a medical  
15 watch, really all that matters to you is, What time  
16 period do you want me to do the checking?

17 In other words, is there a thing called  
18 medical watch?

19 A. Yeah, the 13 -- 30-minute medical watch or  
20 15-minute medical watch.

21 Q. So either one could be the medical watch?

22 A. Uh-huh (affirmative).

23 Q. I see.

24 That's a yes, right?

25 MR. BUTTERFIELD: Is that a yes?

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1 THE WITNESS: Yes. Sorry.

2 MR. BUTTERFIELD: You've been doing good.  
3 That's, I think, your first one.

4 MR. DRAPER: He's done good.

5 Q. (BY MR. DRAPER:) So, in this case, were  
6 you aware of any medical watch being placed on her,  
7 or were you just doing the regular 30-minute watch  
8 that was required in Lima?

9 A. I can't remember.

10 Q. In Lima, do you typically do a 30-minute  
11 watch?

12 A. Not typically, but there can be.

13 Q. Well, I have that there was a 7 and a 7:30  
14 and an 8:00, when you saw the problem. Does that  
15 sound right, that you, on this occasion, did those  
16 30-minute watches?

17 A. I don't remember if I did.

18 Q. Certainly, before the 8:00 -- well, let's  
19 just ask you. Before the 8:00 watch, what, if  
20 anything, did you observe of Heather Miller? What  
21 did you see?

22 A. Well, when I came back for -- bringing the  
23 bedding for the --

24 Q. Right.

25 A. -- lower bunk in Lima, when they moved

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1 her -- I went into Lima, I can't remember why, but  
2 Corporal Johnson was still in there, and she was  
3 laying on the ground, and I had thought that was  
4 unusual, but --

5 Q. Why so?

6 A. We don't typically see someone laying on  
7 the ground. They're usually on their bunk.

8 Q. Did you say something about it?

9 A. I just said it to my corporal, I thought  
10 it was weird. But I said, When people come off --  
11 she said, When people come off drugs, they get hot,  
12 so they'll lay on the ground.

13 Q. Did you think that she was coming off  
14 drugs, or that's just what she said?

15 A. I didn't know.

16 Q. Do they typically put someone in a top  
17 bunk if they're coming off drugs, or do they put them  
18 on a lower bunk?

19 MR. BUTTERFIELD: Foundation.

20 Go ahead and answer.

21 THE WITNESS: I don't really know.

22 Q. (BY MR. DRAPER:) Do you get involved in  
23 the screening and the placement of inmates as they  
24 come into the jail, placement of whether they're on a  
25 top bunk or not?

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1 A. No. Usually it's the clerks that do.

2 Q. Yes.

3 A. But I do know if they're, like, having  
4 withdrawals --

5 Q. Yes.

6 A. -- they do -- they are put on lower bunks.

7 Q. So, in this case, Heather Miller was --  
8 when she fell, she was on the top bunk. What would  
9 that tell you?

10 MR. BUTTERFIELD: Vague.

11 Go ahead and answer.

12 THE WITNESS: What do you mean, what --

13 Q. (BY MR. DRAPER:) Well, would you assume a  
14 person on the top bunk would be having withdrawals?

15 MR. BUTTERFIELD: Incomplete hypothetical.

16 THE WITNESS: I don't know. Like I said,  
17 I hadn't interacted with her before, so I didn't know  
18 if she was withdrawing.

19 Q. (BY MR. DRAPER:) So you saw her down  
20 there, and she was on the floor, and that was before  
21 the 8:00.

22 Who was in there with her that you talked  
23 to about her laying on the ground?

24 A. It was Corporal Johnson.

25 Q. You see her laying on the ground. That

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1     seemed odd to you. Then what happened? Anything  
2     else about that visit?

3             A.     No. We just left.

4             Q.     So then Corporal Johnson is gone, and you  
5     come back around 8:00, I understand.

6             A.     Yes.

7             Q.     What did you observe at that time?

8             A.     At that time, when I was doing my rounds,  
9     she was towards the door more.

10            Q.     Still on the ground?

11            A.     Still on the ground.

12                    She was laying with her head towards the  
13     door and her foot up on the toilet. Like I said, I  
14     was still pretty new. She was naked, so my instinct  
15     was to quit looking and just move on with my round,  
16     but I thought I noticed some blood on her chin. So I  
17     went back and checked, and there was, and then that's  
18     when I went to the pod, or the bubble, and then  
19     that's when I called the nurses again.

20            Q.     Was there blood on the ground? Was there  
21     any kind of blood on the ground?

22            A.     I didn't see any. I don't remember,  
23     though.

24            Q.     Did you see blood on her hands?

25            A.     I don't remember. I just remember a

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1 little bit of blood on her chin, which I didn't  
2 notice before.

3 Q. Did you form an opinion about her unusual  
4 position, as you've called it, with her leg up on the  
5 toilet? Did that make you think anything?

6 A. Like I said, it's something I'd never seen  
7 before.

8 Q. It was something you'd never seen before,  
9 you said?

10 A. Yeah, it was something I'd never seen  
11 before.

12 Q. The fact that she was naked, what did that  
13 make you think?

14 A. Just made me uncomfortable. I mean, I  
15 don't --

16 Q. Right.

17 So when you saw her there, you determined  
18 to do something. What did you determine to do? You  
19 saw it, you said, Hey, I see blood on her chin. You  
20 observed her. What did you then do? What did you  
21 decide you were going to do?

22 A. I just went in and called medical. Went  
23 to the pod and -- on the phone -- not on my radio,  
24 but on the phone. Called medical on the phone.

25 Q. Why was it that you felt that medical

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1 needed to be involved?

2 A. Because there was blood on her chin that I  
3 didn't see before.

4 Q. So now you're in this pod with --

5 A. Clerk Rogers.

6 Q. Kirk Rogers.

7 A. Clerk. Sorry.

8 Q. I'm sorry. Clerk Rogers, yes.

9 You pick up the phone, and he's there to  
10 hear your conversation with the nurses. It's just  
11 the two of you in there, right?

12 A. Yeah. Yes.

13 Q. So tell me about your conversation to  
14 medical, and be as step-by-step as much as you can.  
15 Who said what and, you know, that type of thing.

16 A. I'm pretty sure I was on the phone with  
17 another nurse. I don't believe it was Marv. I  
18 believe it was Nurse Daniel. And I told her what had  
19 happened, that she was naked, on the ground, with her  
20 head towards the door and that she had blood on her  
21 chin that I hadn't seen before.

22 And they said, Well, is she doing okay?

23 And I said, I asked if she was okay, and  
24 she kind of gave me a wave, so I took that as she was  
25 all right.

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1                   And then he said, Okay, just kind of keep  
2                   an eye on her, and if she gets any worse, let him  
3                   know.

4                   Q.       Well, I'm going to back you up a little  
5                   bit.

6                   A.       Okay.

7                   Q.       You told the attorney general that you  
8                   could hear Anderson on that call as well. You could  
9                   hear him in the background.

10                  Do you remember that?

11                  A.       I don't remember.

12                  Q.       I'll represent to you that Nurse Lloyd  
13                  stated that this was on a speakerphone.

14                  A.       Deputy Lloyd?

15                  MR. BUTTERFIELD: This is Deputy Lloyd.

16                  Q.       (BY MR. DRAPER:) I'm sorry. Layton.  
17                  Nurse Layton indicated that that conversation was on  
18                  a speakerphone.

19                  Do you know about that?

20                  MR. BUTTERFIELD: Foundation.

21                  THE WITNESS: I don't know. My phone was  
22                  on speaker or the nurses' station?

23                  Q.       The nurse's phone.

24                  A.       I can't remember.

25                  Q.       Just a moment. We can take a break and I



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1 can have you read that statement, and I think I may  
2 have you do that. But I'm going to read a paragraph  
3 that says -- and this is the Memorandum of Interview  
4 prepared by Tyson Downing, the attorney general's  
5 office.

6 He says, Lloyd said he called on the phone  
7 rather than his radio, because it didn't seem  
8 life-threatening, but he was concerned. He spoke  
9 with, he believes, the other nurse, Nurse Dan. Lloyd  
10 thought he also heard Nurse Marvin in the background.  
11 Lloyd told Nurse Dan that Ms. Miller was laying on  
12 the ground, was naked, and had a little bit of blood  
13 on her chin. He was asked if she was moving and  
14 breathing, and he responded that she was. He was  
15 then told to keep an eye on her. Lloyd said, I  
16 wanted them to come down and look at her, but didn't  
17 explicitly ask.

18 Is that an accurate summation of that  
19 phone call?

20 A. That was so long ago. I did want them to  
21 come back down. I don't know. I don't remember.  
22 Sorry.

23 Q. Well, and I also have the actual video of  
24 this, and we could actually even have you watch that,  
25 if you'd like.

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1 A. Okay.

2 Q. We may need to take a break to have you  
3 observe that.

4 A. Okay.

5 Q. Let's do this, at the moment here. I'm  
6 going to hand you a copy of this report.

7 A. Okay.

8 Q. See if that refreshes your recollection.

9 MR. DRAPER: We'll take a short break  
10 while you read that.

11 MR. BUTTERFIELD: Let's go off the record,  
12 then.

13 MR. DRAPER: Yes.

14 (Off the record from 10:12 a.m. to  
15 10:18 a.m.)

16 MR. DRAPER: We're back on the record.

17 MR. BUTTERFIELD: Yes.

18 Q. (BY MR. DRAPER:) So you've had a chance  
19 to review that statement. Does that jog your memory  
20 on anything?

21 A. A little. Yeah, a little.

22 Q. What can you add to help us understand  
23 that?

24 A. What?

25 Q. That phone call.

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1 A. Phone call?

2 Q. Do you now remember Anderson being in the  
3 background, Marvin Anderson?

4 A. I don't really remember if it was Anderson  
5 or not. I don't want to say yes and I don't want to  
6 say no.

7 Q. At the time you gave this statement, it  
8 states that that was your memory. Is that --

9 A. Okay.

10 Q. -- possible?

11 A. Yeah.

12 Q. Okay. So now there's a conversation that  
13 took place. You tell them what you're seeing in that  
14 cell. And just because of our break, if you don't  
15 mind -- I'm not just trying to get you to repeat it,  
16 but you've described seeing her naked, laying in an  
17 odd position --

18 A. Yeah.

19 Q. -- with blood on her chin.

20 A. (The witness is nodding his head in the  
21 affirmative.)

22 Q. What else did you tell them?

23 MR. BUTTERFIELD: Asked and answered.

24 THE WITNESS: Just that her foot was on  
25 the toilet -- because the toilet -- the door is here,

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1 with the window (indicating), and then the toilet --  
2 and the sink is right here (indicating).

3 She was laying head towards the door and  
4 her foot on the toilet. Like I said, she was naked,  
5 but she had a bra on. So my first response was to  
6 walk away and not see it, but then, you know, I've  
7 got to be sure to do my check.

8 Q. Right.

9 A. So I went back, and she did have some  
10 blood on her chin.

11 Q. And the bra was only covering one breast,  
12 as I understand. You don't remember that?

13 A. Yeah.

14 Q. So you weren't trying to look. Okay.

15 A. Yeah.

16 Q. I understand.

17 So what did the medical tell you?

18 A. On the phone?

19 Q. Yes.

20 A. Just to keep an eye on her. They said if  
21 she's still -- yeah.

22 Did she respond?

23 I said, Yeah, she raised her hand.

24 And then they -- if she gets worse, let  
25 them know.

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1 Q. Do you remember saying that they told you  
2 just not to think too much about it?

3 A. I don't remember -- I don't remember that.  
4 I just remember them saying if she gets worse, let  
5 them know.

6 MR. DRAPER: Let's get this marked as  
7 [Exhibit-2](#). This is the Memorandum of Interview of  
8 Deputy Lloyd.

9 (Deposition [Exhibit-2](#) was marked for  
10 identification.

11 Q. (BY MR. DRAPER:) I'm going to show you  
12 this statement. We'll mark this as [Exhibit-3](#). This  
13 is the same interview from the attorney general, but  
14 this is from Roberta Wall.

15 A. Okay.

16 Q. Look on the last page of that.

17 A. Okay.

18 Q. Two-thirds of the way down the page.

19 Her testimony. Deputy Lloyd told her that  
20 he'd reported when he saw the blood on the inmate, he  
21 called medical and that whomever he spoke with in  
22 medical told him to, more or less, not worry about  
23 it.

24 Did you tell Deputy Wall about that?

25 MR. BUTTERFIELD: Where are you reading?

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1 Oh, it's the last --

2 MR. DRAPER: The last sentence, actually.

3 MR. BUTTERFIELD: Okay. I gotcha.

4 THE WITNESS: I don't remember that.

5 Sorry.

6 MR. DRAPER: We'll mark that as Number 3.

7 (Deposition [Exhibit-3](#) was marked for  
8 identification.)

9 MR. DRAPER: And then we have another  
10 statement from Lawrence Lucius. This one will be  
11 marked as Number 4. This is Lawrence Lucius'  
12 statement.

13 (Deposition [Exhibit-4](#) was marked for  
14 identification.)

15 Q. (BY MR. DRAPER:) On the second page, at  
16 the top, he states, Deputy Lucius said that Deputy  
17 Lloyd said he had called medical about it, and  
18 medical's response was to, quote, Don't look too much  
19 into it.

20 You've got two individuals saying --

21 A. Right.

22 Q. -- that you said that.

23 Did you say that to Deputy Lucius?

24 MR. BUTTERFIELD: Asked and answered.

25 Go ahead and answer.

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1 THE WITNESS: I don't remember.

2 Q. (BY MR. DRAPER:) Is it just that you  
3 don't remember, or maybe if you -- is there something  
4 that would jog your memory to remember these  
5 statements to these two additional people?

6 A. I don't remember saying that to them at  
7 all. I'm sorry. All I remember from talking on the  
8 phone with medical, is they said just keep an eye on  
9 her, and if she gets worse, let them know, and I  
10 didn't really like that response.

11 Q. Okay. You didn't like that response.

12 A. That's when I got Deputy Lucius.

13 Q. Why did you not like that response?

14 A. She had blood on her chin. I mean,  
15 something else could have happened in that time.

16 Q. Right.

17 A. I don't know. I can't remember back that  
18 far. It was a year and a half ago almost.

19 MR. DRAPER: Let's take a quick break for  
20 just a second while I grab a photograph.

21 (Off the record from 10:24 a.m. to  
22 10:28 a.m.)

23 Q. (BY MR. DRAPER:) Before I show you this  
24 photograph of Heather's chin, do you remember talking  
25 to Clerk Rogers about what medical said to you?

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1           A.     Not really talking to him. I just said,  
2 I'm just kind of -- I had them call back in the pod  
3 to see if she was okay, and then that's when I went  
4 and got Deputy Lucius.

5           Q.     Right. You're having this conversation  
6 with medical. We've looked at all these exhibits.  
7 We had Deputy Wall, we had Deputy Lucius, all saying  
8 that you told them that you were told not to think --  
9 not to -- let me get it right. We have Wall saying,  
10 told him to, more or less, not worry about it. And  
11 you had Lucius saying -- Deputy Lucius said that  
12 Deputy Lloyd said he had called medical about it, and  
13 medical's response was don't look too much into it.

14                 Now I'm going to give you what I'll mark  
15 as [Exhibit-5](#), and I'm going to have you look on the  
16 second page, at the top. This is Clerk Rogers, and  
17 he's listening to your side of the information, isn't  
18 he? Right?

19           A.     Yes.

20           Q.     And he says, Rogers then heard Lloyd  
21 say -- or said, quote, So I should just not think too  
22 much about it, and was told, Yeah.

23           A.     (The witness is nodding his head in the  
24 affirmative.)

25           Q.     Now, I reviewed and listened to the



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1 attorney general's video.

2 A. Uh-huh (affirmative).

3 Q. If you're not real clear on it today, but  
4 you talked to the attorney general back a year ago,  
5 do you think that your recollection might have been  
6 more clear back then?

7 A. Yes, back then. Like I said, it's  
8 possible I said it -- or that it was said, but I  
9 just -- I don't remember.

10 Q. Okay. Fair enough.

11 But either way, you didn't like that  
12 answer, you said, and that's when we took our break.  
13 Why did you not like that answer? The blood on her  
14 chin, I guess.

15 A. Yeah.

16 Q. Is that all, or was there more that made  
17 you feel concerned about that answer?

18 A. Well, like I said, just her behavior. I  
19 mean, she's naked on the ground, had blood on her  
20 chin. That's why I called medical. And then I went  
21 and got another deputy, and then that deputy called  
22 Sergeant Wall to come in.

23 Q. So you specifically went to get Dr.  
24 Lucius, because you didn't --

25 A. Deputy Lucius.

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1 Q. -- Deputy Lucius, because you did not like  
2 the response you got from medical?

3 A. Right.

4 Q. I'm going to show you [Exhibit-6](#). It's  
5 just a photo -- it's an autopsy photograph of Heather  
6 Miller's chin. It's kind of a close photo, and it  
7 has a metric which has been blown up so that the  
8 metric -- you just have to compare that.

9 A. Right.

10 Q. Were you able to observe that on her chin,  
11 or just the blood on it?

12 A. I just noticed the blood on it, yeah.

13 MR. DRAPER: Let's mark this.

14 (Deposition [Exhibit-5](#) was marked for  
15 identification.)

16 (Deposition [Exhibit-6](#) was marked for  
17 identification.)

18 Q. (BY MR. DRAPER:) So Deputy Lucius is  
19 someone that actually helped train you, isn't he?

20 A. Yeah, he was my -- what's it called --  
21 FTO, field training officer.

22 Q. You trusted him, you had confidence in  
23 him?

24 A. Yes.

25 Q. And he's had a lot of experience?

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1 A. Yes.

2 Q. Is that why you sought him out?

3 A. Yes.

4 Q. What were you hoping to get from him?

5 A. Just a second opinion, what his thoughts  
6 were.

7 Q. About Heather Miller's condition --

8 A. Yeah.

9 Q. -- and the problem?

10 A. Yeah. Yes, about Heather Miller. Yeah.

11 Q. So you went and got him.

12 A. (The witness is nodding his head in the  
13 affirmative.)

14 Q. How far away was he? Was it a short time?  
15 How long to get him?

16 A. That, I don't remember. I think he was  
17 pretty much right outside. So you have pod four,  
18 like I said, there's a horseshoe hall, and then  
19 there's another hall that goes this way (indicating)  
20 into the Legacy hallway, the long hallway that goes  
21 this way. I think he was just right out the door. I  
22 don't know --

23 Q. Okay.

24 A. -- which pod he was working in, but I  
25 think it was close to mine.

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1 Q. Maybe five?

2 A. I don't know if it was five or six, yeah.

3 Q. In any regard, you got him pretty readily,  
4 and he came back with you?

5 A. Right, yes.

6 Q. Did you tell him what response medical had  
7 given to you about this inmate you were concerned  
8 about? What was the conversation?

9 A. I don't remember the conversation. Like I  
10 just remember, like, Come and look at her, see what  
11 you think.

12 That's pretty much what it was, yeah. And  
13 then when we walked in there and he saw that she was  
14 naked, that's when he called Sergeant Wall.

15 Q. Okay. So when you walked in there, are  
16 you actually looking in the window, or did you --

17 A. Window.

18 Q. -- walk in the door?

19 A. Window.

20 Q. Looking in the window.

21 And you called Sergeant Wall, who is  
22 female?

23 A. Yes.

24 Q. Why did you call her?

25 A. Lucius called her.

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1 Q. Okay.

2 A. Because she was female, and since she was  
3 naked.

4 Q. So now explain what happened at that  
5 point. Walk us through that.

6 A. Well, I remember she was -- when we got  
7 the wheelchair, Sergeant Wall decided to move her to  
8 medical. Me and Lucius went in and picked her up and  
9 put her in the wheelchair, and then we wheeled her  
10 down to medical.

11 Q. How long was -- from the moment that you  
12 called medical until you got Lucius and Wall and went  
13 into the cell and dealt with Heather and got her in  
14 the wheelchair, that whole process, everything that  
15 happened, how long before you got her down to medical  
16 from that, by memory?

17 A. I have no idea how long it would be. I  
18 have no idea. I'm sorry.

19 Q. Okay.

20 A. That's a pretty long -- it's a pretty long  
21 walk from pod four down to medical, because the  
22 hallway is pretty long. So I would assume, I don't  
23 know, five, ten minutes. I don't know.

24 Q. For the walk or --

25 A. The walk, yeah.

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1 Q. -- the whole time? Okay.

2 Well, did you delay from the time medical  
3 told you not to think too much about it, until the  
4 time you went and got Deputy Lucius, or did you go  
5 right there?

6 A. It was right after, yeah, because we  
7 just -- like once I got the phone, I walked out and  
8 he was right there, and that's when I grabbed him.

9 Q. Okay.

10 A. He was just right outside my pod.

11 Q. What took place in the cell? You  
12 described lifting her onto the wheelchair. Was there  
13 any attempt to get medical care?

14 A. Yeah, to take her down to medical.

15 Q. Do you recall a call from Wall to medical,  
16 asking them to come?

17 MR. BUTTERFIELD: Foundation.

18 Q. (BY MR. DRAPER:) Do you recall anybody in  
19 that cell at that time calling medical, on the radio  
20 or otherwise?

21 A. I don't remember that, no.

22 Q. So what your memory is, you basically had  
23 all of these people involved. And we have you, Wall,  
24 Lucius. Who else?

25 A. And Corporal Johnson.

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1 Q. Johnson. Four of you?

2 A. Yeah. Yes.

3 Q. The four of you take her down to medical  
4 in that wheelchair?

5 A. Yes.

6 Q. And I guess -- were you able to get her to  
7 get clothes on, or did you use a blanket or  
8 something?

9 A. Yeah, there was a -- because we get blue  
10 blankets with them, because it -- we just, yeah, I  
11 think wrapped her up in a blanket.

12 Q. On the way to medical, what was she doing?

13 A. She was sitting in a wheelchair.

14 Q. Was she making any motion? Was her body  
15 doing anything other than just sitting in the  
16 wheelchair?

17 A. She was, like, cold and sweaty, like kind  
18 of clammy.

19 Q. What was her skin color like?

20 A. Pale, I guess, like -- I don't know.

21 Q. Maybe gray, kind of, looking?

22 A. Yeah.

23 MR. BUTTERFIELD: Misstates prior  
24 testimony.

25 Q. (BY MR. DRAPER:) Pale, you said?

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1           A.       Yeah. That's what I wrote, was gray, but  
2       yeah, palish, kind of.

3           Q.       When you said what you wrote, that's in  
4       your --

5           A.       Yeah, a gray color.

6           Q.       -- [Exhibit-1](#) report?

7                    Why don't you read exactly what that says  
8       there.

9           A.       Heather -- we decided to move -- Sergeant  
10       Wall decided to move Heather -- inmate Miller,  
11       Heather, to medical because she was unresponsive and  
12       her skin color was gray. Her skin was cold to the  
13       touch and sweating profusely.

14                   I do remember that, because when I put her  
15       in the wheelchair, it was -- she was really cold,  
16       like -- but she was still -- yeah.

17                   And then at this time, Corporal Johnson  
18       came in to help assist her into the wheelchair.

19           Q.       Was she combative? Was she thrashing  
20       around?

21           A.       No, no, no. We just put her in the  
22       wheelchair. She did -- I think she kind of stiffened  
23       up a couple of times. I don't know if she was a --  
24       but she kind of stiffened up a couple of times,  
25       because she wouldn't keep her feet on the little feet



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1 holder pedals.

2 Q. So stiffening up would be like stretching  
3 her legs out, is what you're describing?

4 A. Uh-huh (affirmative), or seizing or -- I'm  
5 not sure what it was.

6 Q. Okay. So you took her to medical?

7 A. Uh-huh (affirmative).

8 Q. Who was the first person you came across  
9 in medical?

10 A. Well, we took her into medical, and that's  
11 when -- I can't remember which nurse it was. They  
12 started hooking her up to the blood pressure monitor,  
13 get the oxygen thing on her finger, and then oxygen.

14 Q. Was it Nurse Anderson?

15 A. I don't remember who -- which nurse it  
16 was.

17 Q. Do you remember Nurse Anderson or anyone  
18 saying something to you about, Really, you're  
19 bringing her to me dead, a comment like that?

20 A. I don't remember any kind of comment. I  
21 remember it was like, Yeah, we need to get her to the  
22 hospital. I believe that was Anderson. I can't  
23 remember, though.

24 Q. Did he say, We need to get her out of  
25 here, or We need to get her to the hospital?

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1 A. Hospital. I believe. I can't remember.

2 Q. When you say you can't remember but you're  
3 telling me about it, it sounds like --

4 A. Yeah.

5 Q. -- you remember it, but it's not -- what?

6 A. Too clear.

7 Q. Okay.

8 A. I don't remember.

9 Q. But you do recall --

10 A. Yeah.

11 Q. -- that seemed to be the case.

12 All right. So now you're there in  
13 medical. Did you stay with her until the EMTs  
14 arrived?

15 A. I was there. I was holding the blanket  
16 down on her, so when she moved, that she wouldn't be  
17 exposed.

18 Q. How long after you got her to medical did  
19 a call go to the EMTs to arrive -- did the call go  
20 for the EMTs?

21 A. I'm not sure who called the EMTs, so I  
22 don't know when it was placed.

23 Q. Then let's ask, from the moment you got to  
24 medical, until the EMTs arrived, how long do you  
25 think went by? How much time went by?

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1 A. I don't remember how long it was.

2 Q. Do you remember conversations with the  
3 EMTs about them waiting at the sally port?

4 A. No. What do you mean, waiting at the  
5 sally port?

6 Q. Well, I'm just saying the EMTs were  
7 critical that they couldn't get into the medical  
8 facility -- your medical unit, and that they were  
9 kept out of the sally port while they're waiting.

10 Do you remember any conversation about  
11 that?

12 A. I don't remember any -- know that.

13 Q. When they arrived, what did the EMTs do,  
14 that you observed?

15 A. They just --

16 Q. Attended to her? Took her away?

17 A. Yeah. Sorry, I can't remember if it was  
18 the EMTs or if it was our paramedics.

19 Q. You know what, I'm calling it the EMTs. I  
20 don't know, what's the difference for you, the EMTs  
21 or the paramedics?

22 A. So EMTs -- I can't remember if it was EMTs  
23 or if it was paramedics. Because we have our own --  
24 Davis County has our own paramedics. I think -- I'm  
25 not sure. Like I don't want to say, because I'm not

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1 a hundred percent on it. Because Farmington Fire  
2 Department will come in, and they've got the EMTs who  
3 come in and they'll take them out on an ambulance,  
4 and we have our own paramedics that can come in and  
5 do stuff too. I swore I saw our paramedics there,  
6 but --

7 Q. These are the paramedics with their  
8 ambulance, is what you remember?

9 A. Well, we don't have an ambulance.

10 Q. Well, the paramedics brought an ambulance  
11 with them, right?

12 A. Okay.

13 Q. I don't want to -- I'm asking you, man.

14 A. I know. I'm sorry, I didn't --

15 Q. Who showed up, that you remember?

16 A. I can't remember his name. Because he's a  
17 deputy paramedic. I can't remember his name, though.  
18 Because that's -- oh, I can't remember his name. It  
19 starts with a P.

20 Q. But do you know from what department they  
21 came?

22 A. I could have sworn it was our guys, Davis  
23 County sheriff paramedic.

24 Q. Well, Zach --

25 A. Yes.

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1 Q. -- just as a human being, how did you feel  
2 about the attention given to Heather Miller by the  
3 nursing staff at the jail? How did you feel about  
4 it?

5 A. I don't know. Like I'm not a nurse, so I  
6 don't know what the procedures or anything are  
7 dealing with that. I think they did their job.

8 Q. But there was one point you were so  
9 dissatisfied, you went to get a second opinion.

10 A. Yes.

11 Q. How did you feel at that point about the  
12 nurses?

13 A. I don't know. I mean, I was not happy  
14 that they didn't -- I don't know. Like I said, I  
15 didn't ask them to come down when they were just  
16 listening to my concern.

17 Q. I'm sorry, I missed that. I couldn't  
18 hear.

19 A. I mean, I didn't ask them to come down. I  
20 mean, I told them about the blood on the chin and her  
21 behavior. I mean, there's not much else I can do  
22 beyond that, so I just got another person to come in.

23 Q. This is a broad question: Is there  
24 anything that I haven't asked you that has been  
25 discussed by topic that you'd like to add or that you

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1 didn't got a chance to respond to completely or that  
2 would help me understand better what happened here?

3 A. I don't think so. I think that's pretty  
4 much it.

5 Q. Fair enough.

6 MR. DRAPER: I think I'm pretty well done.  
7 Let me take a minute with my cohorts here and see if  
8 there's anything else I want to go into.

9 THE WITNESS: Okay.

10 (Off the record from 10:44 a.m. to  
11 10:51 a.m.)

12 MR. DRAPER: Let's go back on.

13 Q. (BY MR. DRAPER:) Officer Lloyd, just a  
14 few further questions.

15 On falls from bunks, I understand that  
16 you've changed the policy that you've adopted for  
17 head counts, because of that. Is that right?

18 A. Because of the first fall I had, when he  
19 split his ear open.

20 Q. Okay.

21 A. So when they jump off -- we can lock them  
22 down for the day if they don't stand for head count.  
23 So people get -- you know, people have masks with eye  
24 things, so it blocks out the light, earphones -- not  
25 earphones, but earbuds so they can block out sound.

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1 I understand that, so I don't make them  
2 get up and stand at the door for head count. As long  
3 as I can see their face, they take the thing off so  
4 there's no bruises or anything on their face and I  
5 know they're alive, then I'm good.

6 Q. So you actually were adopting that  
7 policy --

8 A. Before.

9 Q. -- at the time Heather fell?

10 A. Uh-huh (affirmative).

11 Q. It was already in place. But she  
12 apparently fell getting down for the head count?

13 A. Uh-huh (affirmative).

14 MR. BUTTERFIELD: Are those yeses?

15 THE WITNESS: Yes. Sorry.

16 MR. DRAPER: Sorry. Thank you.

17 THE WITNESS: Yeah.

18 Q. (BY MR. DRAPER:) I want to talk about the  
19 difference between a regular check and a medical  
20 check. Is there a difference, or is it just the  
21 frequency?

22 A. Frequency.

23 Q. So if it's a medical, it's not suggesting  
24 that it's somebody with medical training, it's just  
25 medical has ordered a more frequent look?

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1 A. Yes.

2 Q. Now, we've talked about it, I'm not trying  
3 to rehash it, but you and Rogers were discussing, and  
4 it looked to me that -- well, I'm reading a 7:00, a  
5 7:30 and then an 8:00 check. That would be every  
6 half hour.

7 Do you know if that was a schedule you  
8 were following? Is that what you typically do in  
9 Lima?

10 A. That's something we typically do. And I  
11 don't remember doing all those checks.

12 Q. Do you remember the 8:00 one, and do you  
13 remember one prior?

14 A. I don't recall. And then the head count,  
15 yeah.

16 Q. The head count in Kilo.

17 A. Uh-huh (affirmative).

18 Q. But then in Lima, you described at least  
19 one check prior that you remember, because she was  
20 still on the floor.

21 A. Right.

22 Q. But you're not clear if it was 7 or 7:30  
23 at this point. Maybe --

24 A. Yeah, I don't --

25 Q. Maybe what you said was you don't remember



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1 the 7:00 one.

2 A. Right, I don't remember -- yeah, I don't  
3 remember the 7:00 one or 7:30 one.

4 Q. Well, I can tell you that we've got the  
5 video. Some big brute's walking by around 7:00.

6 A. Okay.

7 Q. You know, so -- look, I just -- I'm not  
8 the one testifying, but -- and it's not that  
9 important, really, I don't think, but I just wanted  
10 to know if you recall a specific assignment to do a  
11 30-minute check for this girl.

12 A. I don't remember if there was a watch put  
13 on her.

14 Q. Have you had any training in drug  
15 withdrawal?

16 A. No. A little bit in the academy, but they  
17 just kind of touch on it. I don't remember a drug  
18 withdrawal, though.

19 Q. So nothing specific that would qualify you  
20 to state whether a person was or wasn't coming down  
21 from drugs?

22 A. Right. Yeah, no experience in that.

23 Q. So when you see her on the floor in Lima,  
24 you don't really have a way of saying why you thought  
25 she was having all these aspects of her strange

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1 behavior, she's laying there, she's virtually naked.

2 A. Right.

3 Q. You don't know what the cause of that was?

4 A. Yeah. Like I said, it was strange  
5 behavior. That's -- yeah.

6 Q. I didn't have you talk too much, and I  
7 don't know how much information you recall, but when  
8 you brought Lucius to the cell in Lima, and Wall  
9 appears and Anderson -- not Anderson. He didn't show  
10 up. The lieutenant. What's his name -- or her name?

11 A. Sergeant Wall? Sergeant Wall, Corporal  
12 Johnson, and Lucius.

13 Q. Corporal Johnson, yes.

14 So all of you are in there. Can you  
15 explain what people were doing from the time they  
16 arrived until you guys all took her out to medical?  
17 What happened during that time?

18 MR. BUTTERFIELD: Asked and answered.

19 Go ahead.

20 THE WITNESS: It's hard to remember, but I  
21 remember Sergeant Wall trying to get her dressed so  
22 we could take her to medical. That's --

23 Q. (BY MR. DRAPER:) Was anyone, that you  
24 could observe, trying to offer some type of medical  
25 help -- or maybe not even medical, just personal

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1 help, other than getting her dressed?

2 A. Say that again.

3 Q. Well, I don't know what people were doing.  
4 Were they just standing and watching or hoping that  
5 Wall got her dressed?

6 A. Yeah, because being a male deputy, you  
7 don't -- you know, she's naked, so the females will  
8 go in there and try to get that taken care of,  
9 getting dressed.

10 Q. In my review of all of these tapes, all  
11 the testimony and the surveillance tapes and the  
12 attorney general's timeline, all of that seems to  
13 indicate that from the time you saw Heather Miller in  
14 Lima and made your call -- from the time of that call  
15 to medical until the time of arriving in medical was  
16 about 21 minutes.

17 Does that sound right?

18 A. From, like, when I saw her --

19 Q. Phone call to --

20 A. Phone call?

21 Q. -- visit to medical.

22 A. About 21 minutes?

23 Q. That's what I determined. I'm asking if  
24 that sounds right to you.

25 A. Yeah, it could sound about right, trying

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1 to get her dressed, getting her into a wheelchair.

2 And then, like I said, it's a long hallway.

3 Q. Now, had medical come down right when you  
4 called them, how long do you think it would have  
5 taken for them to get there?

6 MR. BUTTERFIELD: Speculation, foundation.  
7 Go ahead and answer.

8 Q. (BY MR. DRAPER:) How far is medical from  
9 there? If they were in medical, how long would it  
10 take for them to get from medical to there? Two  
11 minutes?

12 A. Two to five minutes, maybe.

13 Q. Do you know how long the paramedics  
14 waited?

15 A. I don't know how long they waited.

16 Q. Do you know how long from the time she  
17 arrives in medical until the time the paramedics took  
18 her away?

19 A. I don't remember how long it was.

20 Q. Okay. I'm just asking you.

21 A. Yeah.

22 MR. DRAPER: Okay. I think that's all I  
23 have. Thank you. I appreciate it.

24 MR. BUTTERFIELD: I don't have any  
25 questions.

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1                   We'll read and sign. You can send it to  
2 my office.

3                   (The deposition proceedings concluded at  
4 10:58 a.m.)



## ZACHERY TYLER LLOYD - August 22, 2018

Case: STELLA VS. DAVIS COUNTY, ET AL.  
Case No: 1:18-cv-002 Date: August 22, 2018  
Reporter: Jennifer Nazer Braun, Q&A Reporting, Inc.  
1872 South Main St., Salt Lake City, Utah 84115

## WITNESS CERTIFICATE

STATE OF UTAH )  
) )  
COUNTY OF SALT LAKE )

I, ZACHERY TYLER LLOYD, HEREBY DECLARE  
UNDER PENALTY OF PERJURY: That I am the witness  
referred to in the transcript; that I have read the  
transcript and know the contents thereof; that with  
these corrections, I have noted this transcript truly  
and accurately reflects my testimony.

PAGE	LINE	CHANGE/CORRECTION	REASON
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\_\_\_\_\_ No corrections were made

\_\_\_\_\_  
ZACHERY TYLER LLOYD

SUBSCRIBED AND SWORN to before me

this \_\_\_\_\_ day of \_\_\_\_\_, 2018.

Notary Public: \_\_\_\_\_

My Commission Expires: \_\_\_\_\_

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ZACHERY TYLER LLOYD  
August 22, 2018

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